

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY MPA/USPS-3(G) (October 30, 1997)

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the United States Postal Service hereby objects to the following interrogatory subpart posed by the Magazine Publishers of America: MPA/USPS-3(g), filed on October 20, 1997. The interrogatory seeks information regarding a Postal Service contract to conduct a study of the data collection systems used by the Postal Service in ratemaking; subpart (g) specifically requests whether "any interim progress reports" on the study have been presented to the Postal Service, and, if so, asks that the Postal Service provide copies. The Postal Service objects on the grounds of relevance.

The Data Quality Study referred to in MPA's discovery request has been ongoing since late June, 1997. The Postal Service has identified three progress reports that have been provided thus far by the contractor. These progress reports describe the contractor's plans for initiating work on the contract, and are focused on the mechanics of how the contractor's personnel will do their jobs. The reports do not contain any analyses of data or any results or conclusions reached regarding any of the Postal Service's data collection systems. At most, they describe the procedures by which the contractor is handling and plans to undertake the specific substantive tasks outlined by the contract.

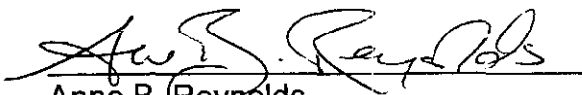
Under Rule 26(a) of the Commission's Rules of Practice, participants may request access to documents " which constitute or contain matters, not privileged, which are relevant to the subject matter involved in the proceeding." This is not the case with the three reports identified as being potentially responsive to MPA's request. While MPA may argue the relevance of a report detailing how a Postal Service contractor is reviewing the specific questions detailed in MPA's discovery request, it is a different matter to impart the procedures of how the contractor is obtaining the information it needs to review. The specific workings of this contract have nothing to do with the quality of the data presented in this proceeding, and providing the requested reports would similarly be of no evidentiary value to the record.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

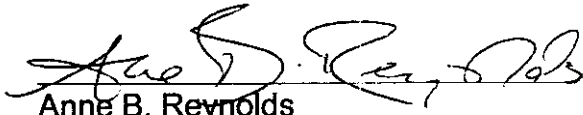
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anne B. Reynolds

475 L'Enfant Plaza West, SW
Washington DC 20260-1137
(202)268-2970; Fax -5402
October 29, 1997